TITLE V SIGNIFICANT MODIFICATION (WITHOUT CONSTRUCTION) APPLICATION REVIEW

Facility Name: Sewell Creek Energy Facility

City: Cedartown

County: Polk

AIRS #: 04-13-233-00042 Application #: 28425

Date SIP Application Received: May 5, 2022
Date Title V Application Received: May 5, 2022

Permit No: 4911-233-0042-V-04-1

Program	Review Engineers	Review Managers
SSPP	Jada Levers	Cynthia Dorrough
Permitting Program Manager		Stephen Damaske

Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Existing Permits

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
4911-233-0042-V-04-0	June 22, 2020	Title V Permit Renewal

B. Regulatory Status

1. PSD/NSR/RACT

The facility is a minor source under PSD regulations as they have requested to limit potential emissions of NOx to less than 250 tons during any twelve consecutive months (major source threshold for PSD NSR pollutants). In addition, the potential emissions of the remaining criteria pollutants do not equal or exceed 250 tpy major source thresholds for PSD. Please make note that the facility is not one of the 28 named source categories.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

	Is the	If emitted, what is the Facility's Title V status for the Pollutant?			
Pollutant	Pollutant Emitted?	Major Source Status	Major Source Requesting SM Status	Non-Major Source Status	
PM	yes			✓	
PM ₁₀	yes			✓	
PM _{2.5}	yes			✓	
SO_2	yes			✓	
VOC	yes			✓	
NOx	yes	✓			
CO	yes	✓			
TRS	yes			✓	
H ₂ S	yes			✓	
Individual HAP	yes			√	
Total HAPs	yes			✓	
GHGs	yes	✓			

II. Proposed Modification

A. Description of Modification

Application No. 28425 was dated May 2, 2022 and received on May 5, 2022, requesting to renew the Acid Rain Permit for calendar years 2023 through 2027. The current Acid Rain Permit has been approved through calendar year 2022, expiring on December 31, 2022. This Acid Rain Permit becomes effective as of January 1, 2023.

B. Emissions Change

There is no change in emissions associated with this modification.

Table 3: Emissions Change Due to Modification

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	Is the	Net Actual Emissions	Net Potential Emissions			
	Pollutant	Increase (Decrease)	Increase (Decrease)			
Pollutant	Emitted?	(tpy)	(tpy)			
PM	yes	0	0			
PM_{10}	yes	0	0			
PM _{2.5}	yes	0	0			
SO_2	yes	0	0			
VOC	yes	0	0			
NO _x	yes	0	0			
CO	yes	0	0			
TRS	yes	0	0			
H_2S	yes	0	0			
Individual HAP	yes	0	0			
Total HAPs	yes	0	0			

C. PSD/NSR Applicability

This modification does not include physical changes or changes in the method of operation of the facility; PSD/NSR is not applicable.

VIII. Specific Requirements

Discuss any of the following specific requirements as they apply to the modification.

A. Operational Flexibility

There is no operational flexibility associated with this modification.

B. Alternative Requirements

There are no alternative requirements associated with this modification.

C. Insignificant Activities

There are no insignificant activities associated with this modification.

D. Temporary Sources

There are no temporary sources associated with this modification.

E. Short-Term Activities

There are no short-term activities associated with this modification.

F. Compliance Schedule/Progress Reports

There are no compliance schedule or progress reports associated with this modification.

G. Emissions Trading

There are no emissions trading associated with this modification.

H. Acid Rain Requirements/CAIR/CSAPR

This facility is subject to the requirements in Title IV of the Clean Air Act. They are subject to 40 CFR 72 (Permits Regulation), 73 (SO₂ Allowance), and 75 (Continuous Emission Monitoring). They are not subject to 40 CFR 76 (Nitrogen Oxides Emission Reduction Program) of the Acid Rain regulations because the turbines do not have the capability to burn coal.

I. Prevention of Accidental Releases

There are no Prevention of Accidental Releases Requirements associated with this modification.

J. Stratospheric Ozone Protection Requirements

The facility is subject to 40 CFR 82 Subpart F, and there are no changes associated with this modification.

K. Pollution Prevention

There are no pollution prevention requirements associated with this modification.

L. Specific Conditions

Not applicable.

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Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//